

September 24, 2003

Sent via e-mail, hand delivery and FAX (617) 345-9103

Mary L. Cottrell, Secretary
Massachusetts Department of Telecommunications and Energy
One South Station, 2nd Floor
Boston, MA 02110

Re: UNE Triennial Review Regarding Switching for Large Business Customers
D.T.E. 03-59

Dear Secretary Cottrell:

Enclosed for filing please find a Motion on behalf of the Communications Workers of America to Intervene and Participate and a Certificate of Service in the above entitled matter.

Thank you for your attention to this request.

Sincerely,

James F. Norton
Paven & Norton
15 Foster Street
Quincy, MA 02169-5307
(617) 847-1719

cc: Attached service list (w/enc.)
Dr. Kenneth Peres
Jesse Keyes, Hearing Officer

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

Proceeding by the Department of Telecommunications and Energy on its)
own Motion to Implement the Requirements of the Federal)
Communications Commission's Triennial Review Order Regarding) D.T.E. 03-59
Switching for Large Business Customers Served by High-Capacity Loops.)
_____)

**MOTION OF THE
COMMUNICATIONS WORKERS OF AMERICA
TO INTERVENE AND PARTICIPATE**

The Communications Workers of America (CWA) respectfully moves to intervene and to participate in the above entitled matter and states as its reasons therefor, that the CWA is a labor organization that represents employees at Verizon and AT&T in the Commonwealth of Massachusetts. CWA members have an interest in this proceeding that will impact the financial and operational ability of their employers Verizon and AT&T to maintain appropriate staffing levels in order to operate, maintain, sell, service, and invest in network facilities and quality customer service.

The CWA also requests that Dr. Kenneth Peres, CWA representative be added to the service list:

Dr. Kenneth Peres
Research Economist
Communications Workers of America, District One
80 Pine Street, 37th Floor
New York, NY 10005
Phone: (212) 344-2515
Fax: (212) 425-2947
Email: kperes@cwa-union.org

Wherefor, the Communications Workers of America respectfully requests that it be permitted to intervene and to participate in this matter to the extent appropriate and permitted by the Department.

Respectfully submitted,
Communications Workers of America
By its counsel,

James F. Norton
Paven & Norton
15 Foster Street
Quincy, MA 02169-5307
(617) 847-1719
Email: jfnlaw@aol.com

CERTIFICATE OF SERVICE

I hereby certify that I have this 24th day of September, 2003, served the foregoing document upon each person designated in the service list by either hand delivery, mail, and/or e-mail.

James F. Norton
Paven & Norton
15 Foster Street
Quincy, MA 02169-5307
(617) 847-1719
Email: jfnlaw@aol.com

September 24, 2003

Sent via e-mail, hand delivery and/or U.S. Mail

Mary L. Cottrell, Secretary
Massachusetts Department of Telecommunications and Energy
One South Station, 2nd Floor
Boston, MA 02110

Re: UNE Triennial Review Regarding Switching for Mass Market Customers
D.T.E. 03-60

Dear Secretary Cottrell:

Enclosed for filing please find a Motion on behalf of the Communications Workers of America to Intervene and Participate in the above entitled matter. A certificate of service will follow when I have obtained a service list.

Thank you for your attention to this request.

Sincerely,

James F. Norton
Paven & Norton
15 Foster Street

Quincy, MA 02169-5307
(617) 847-1719

cc: Dr. Kenneth Peres

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

Proceeding by the Department of Telecommunications and Energy on its)	
own Motion to Implement the Requirements of the Federal)	
Communications Commission's Triennial Review Order Regarding)	D.T.E. 03-60
Switching for Mass Market Customers)	
_____)	

**MOTION OF THE
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TO INTERVENE AND PARTICIPATE**

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